

# EXHIBIT E

**From:** [Murphy, Lindsay M. \(CIV\)](#)  
**To:** "Ramya Krishnan"; "Noam Biale"; "Alexander A Abdo"; "Alexandra Conlon"; "Courtney Gans"; "Jameel Jaffer"; "Michael Tremonte"; "Scott Wilkens"; "Xiangnong Wang"; "Talya R Nevins"; "Jackson Busch"  
**Cc:** [Busen, Jesse \(CIV\)](#); [Hennes, Stefanie \(CIV\)](#); [Kanellis, William G. \(CIV\)](#); [Kanter, Ethan \(CIV\)](#); [Moss, Benjamin M. \(CIV\)](#); [Santora, Victoria M \(CIV\)](#); [Stone, Paul \(CIV\)](#); [Strokus, Jessica D. \(CIV\)](#); [Yen, Shawna \(USAMA\)](#)  
**Subject:** RE: AAUP: Position on Motion to Seal Portion of AR Supplement  
**Date:** Friday, June 13, 2025 5:59:00 PM  
**Attachments:** [AAUP Responses to Plaintiffs First Set of Requests for Production FINAL.pdf](#)  
[AAUP v. Rubio Defendants Prod Vol 01 6.13.25.pdf](#)  
[image001.jpg](#)

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Thanks, Noam and Ramya. And sorry for leaving some of your team members off my prior message. Attached, please find Defendants' responses and objections to your requests for production along with associated documents. We are still finalizing our responses to your ROGs and will have those to you as soon as possible, but likely not before Monday. We are still waiting on agency approval to file one remaining document under seal. Because the document is law enforcement sensitive, the agency is not comfortable producing it without a protective order in place. So, we will be delayed in getting this document to you.

Best,

Lindsay

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**From:** Ramya Krishnan  
**Sent:** Friday, June 13, 2025 3:39 PM  
**To:** Noam Biale ; Murphy, Lindsay M. (CIV) ; Alexander A Abdo ; Alexandra Conlon ; Courtney Gans ; Jameel Jaffer ; Michael Tremonte ; Scott Wilkens ; Xiangnong Wang ; Talya R Nevins ; Jackson Busch  
**Cc:** Busen, Jesse (CIV) ; Hennes, Stefanie (CIV) ; Kanellis, William G. (CIV) ; Kanter, Ethan (CIV) ; Moss, Benjamin M. (CIV) ; Santora, Victoria M (CIV) ; Stone, Paul (CIV) ; Strokus, Jessica D. (CIV) ; Yen, Shawna (USAMA)  
**Subject:** [EXTERNAL] Re: AAUP: Position on Motion to Seal Portion of AR Supplement

Hi Lindsay, just adding a few more lawyers from our team to this chain.

Ramya

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**From:** Noam Biale <[NBiale@shertremonte.com](mailto:NBiale@shertremonte.com)>  
**Date:** Friday, June 13, 2025 at 2:40 PM  
**To:** Murphy, Lindsay M. (CIV) <[Lindsay.M.Murphy@usdoj.gov](mailto:Lindsay.M.Murphy@usdoj.gov)>, Alexander A Abdo <[alex.abdo@knightcolumbia.org](mailto:alex.abdo@knightcolumbia.org)>, Alexandra Conlon <[Aconlon@shertremonte.com](mailto:Aconlon@shertremonte.com)>, Courtney Gans <[CGans@shertremonte.com](mailto:CGans@shertremonte.com)>, Jameel Jaffer <[jameel.jaffer@knightcolumbia.org](mailto:jameel.jaffer@knightcolumbia.org)>, Michael Tremonte <[MTremonte@shertremonte.com](mailto:MTremonte@shertremonte.com)>, Ramya Krishnan <[ramya.krishnan@knightcolumbia.org](mailto:ramya.krishnan@knightcolumbia.org)>, Scott Wilkens <[scott.wilkens@knightcolumbia.org](mailto:scott.wilkens@knightcolumbia.org)>  
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<[Shawna.Yen@usdoj.gov](mailto:Shawna.Yen@usdoj.gov)>

**Subject:** Re: AAUP: Position on Motion to Seal Portion of AR Supplement

**This Message Is From an External Sender**

This message came from outside your organization.

Hi Lindsay,

No objection. Can you give us a sense of the volume of documents you'll be disclosing?

Noam



**Noam Biale**

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**From:** Murphy, Lindsay M. (CIV) <[Lindsay.M.Murphy@usdoj.gov](mailto:Lindsay.M.Murphy@usdoj.gov)>

**Sent:** Friday, June 13, 2025 2:09:39 PM

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**Subject:** AAUP: Position on Motion to Seal Portion of AR Supplement

Hi Noam,

We're finalizing our RFP responses and objections and should have them to you shortly. We also have some additional documents to share. Because at least one of the documents is law enforcement sensitive and non-public facing, and a general protective order has yet to be entered, we'd like to submit it as a sealed supplement to the AR so that it cannot be shared outside of this litigation. We're still evaluating two other documents to determine if they should be sealed as well. Do Plaintiffs have any objection to our motion to submit these documents under seal?

Thanks,

Lindsay